



Request to keep the Jorgensen Outfall Site within ERU  
Holly Arrigoni to: Michael Sibley  
Cc: Aaron Lambert

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Mike,

Thank you for organizing last week's meeting to discuss next steps on the Jorgensen Forge Outfall site that runs along the property boundary of Jorgensen Forge (JF; Includes the former Earle. M Jorgensen property) and Boeing Plant 2. These facilities are on the Duwamish River, and have been designated as Early Action Areas requiring early remediation, including sediment dredging and bank removal, before the larger CERCLA cleanup can begin. I am writing to you as the Project Manager for Boeing Plant 2, with the concurrence of Rick Albright, the Director of Air, Waste & Toxics, to recommend that the final pipe removal remain in the Emergency Response Unit (ERU). Please let me know if you have any questions or need additional information.

#### GENERAL SCOPE

Boeing Plant 2 is preparing to begin dredging December 2012 on the north end of the facility near Slip 4. Jorgensen Forge is scheduled to begin in-water work to the south in August 2013. This past year, the ERU cleaned and capped a long section of a storm water pipe that ran along the JF side of the property boundary between JF and Boeing Plant 2. During that process, it was found that the integrity of the section of pipe nearest the Duwamish River was compromised and that further site characterization needed to be done to see if any releases had occurred. Phase two of the emergency response action incorporated that testing, demonstrating that extremely high PCB levels (in some instances >300ppm) were found at depth. The PCBs have been demonstrated to be limited largely just beneath the broken pipe. The final step (phase 3) will remove the broken pipe and contaminated soil to a projected level of 1ppm PCBs. It seems logical that phase 3 removal would continue under the same authority. It is important to note that the focused area of concern is under multiple authorities: the uplands of JF is under a MTCA Order with the Department of Ecology; the sediments and bank work for JF are under a CERCLA Order; Boeing Plant 2 is in its entirety under a RCRA 3008(h) Order. The small area of concern slated for pipe and soil removal falls a bit under each jurisdiction, with no clean line demarking the regulatory authorities.

It is critical that the contamination be removed prior to any sediment or bank work that is part of the early action/JF and Boeing cleanups that will occur at the property boundary. The contamination is deep, and well within the tidal influence zone leading to a high risk of recontamination if not removed prior to sediment excavation. As an Early Action Area, further delay is not an option, and timeliness is critical in keeping Boeing and JF moving forward. The scale is small (approximately 20' wide X 60' long X 30' deep). The extent of the contamination is well characterized. We think that it is not only logical, but also beneficial for the project to continue under the same authority and finish the work that began last fall. It is particularly advantageous to keep the project under the ERU program, not only to maintain the fast-paced schedule required to complete the removal such that dredging can occur 2013, but also to ensure both PRPs maintain liability for the effort.

#### SCHEDULE

The PRPs have stated they will begin drafting the design documents immediately once we have

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verified the regulatory authority under which the time critical removal can occur. It is projected the timing for removal of the pipe and related soil/sediments will be mid-late summer 2013, tied to when JF begins their bank work.

#### COORDINATION

This is perceived to be a joint effort among Ecology, EPA (RCRA, CERCLA and CERCLA ERU), Boeing, Jorgensen and Earle. M Jorgensen. The PRPs will submit joint design documents, and the Agencies will assist in the review. Largely this is an oversight role, with the PRPs conducting the work.

#### RISKS

Not conducting the removal in a timely manner will either result in significant delay in accomplishing Early Action work (and thus remedial work on the LDW), or a high risk of recontamination due to the contamination's proximity to the waterway. The integrity of the early cleanup action lies in ensuring we prevent known sources to the greatest extent possible. Other authorities do not provide the same level of expedience as those already involved in the pipe removal and could easily add another year onto the early actions and the LDW remediation.

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